

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Clifford A. Lowe, et al.	)	
	)	CASE NO. 1:19-CV-748-JG
Plaintiffs	)	
v.	)	JUDGE JAMES S. GWIN
	)	
ShieldMark, Inc., et al.	)	
	)	
Defendants	)	

**JOINT DECLARATION OF TIMOTHY A. DIMOFF AND JACK MILAM  
PURSUANT TO 28 U.S.C. §1746**

**WE, TIMOTHY A. DIMOFF AND JACK MILAM**, make this joint declaration under 28 U.S.C. §1746.

1. I, Timothy A. Dimoff (“Dimoff”), am President and Chief Executive Officer of SACS Consulting and Investigative Services, Inc. (“SACS”), 520 South Main Street, Canal Place Suite 2516, Akron, OH 44313.
2. I, Jack Milam (“Milam”), am a private investigator employed by SACS.
3. SACS was retained by the law firm of Renner, Kenner, Greive, Bobak, Taylor & Weber Co., L.P.A., counsel for Plaintiffs in the captioned litigation, to engage a certain investigation of Timothy B. Jensen (“Jensen”), whom we understand is an expert witness retained by Defendants in the captioned litigation.
4. Attached as Exhibit 1 is the SACS Investigative Report on Jensen spanning activity on the dates May 20 – May 24, 2022.

5. The attached report of Exhibit 1 is of the form typically employed by SACS, and Sections I, II, and III are particularly advanced by Dimoff as being true and correct with regard to the statements therein.
6. Milam offers that the recitations in Sections IV and V present the observations that he made through his investigation, that they are true and correct, and are consistent with Sections I, II and III.
7. Milam also presents as Exhibit 2 a compilation of photographs that he took of the person of interest within the scope of the investigation, as referenced in Exhibit 1.
8. Milam also presents as Exhibit 3 a video taken of the person of interest within the scope of the investigation, as referenced in Exhibit 1.
9. The photographs and video are presented as true, correct, accurate and unedited portrayals of the observations made by Milam while conducting his investigation.
10. **We, Timothy A. Dimoff and Jack Milam, jointly and severally, declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.**

Date: 5/31/22

  
Timothy A. Dimoff

Date: 5/31/22

  
Jack Milam